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June 15, 2022

Honorable Chad F. Kenney  
Courtroom 11-B  
11613 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

***Re: Perrong v. Timeshare Help Source, LLC, NO. 22-cv-01085***

Dear Judge Kenney:

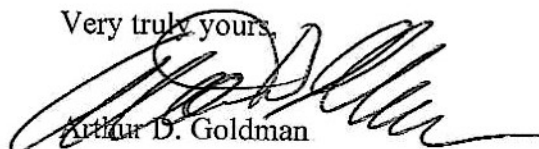
This letter is a joint submission by both counsel in the above-referenced matter. We are requesting a short continuance, if necessary, of the hearing on Defendant's Motion to Compel which is currently scheduled for Thursday, June 16, 2022 at 9:30. The reason for this request is that Plaintiff's representative for the discovery is currently in COVID quarantine in Uzbekistan and we have been unable to finalize our responses. That being said, we have already produced documents, will be producing more today, and have also produced a draft written response to the written discovery to Defendant as a gesture of good faith. We are optimistic we can resolve any issues between us which would eliminate the need for a hearing.

That being said, if we do need to return for a hearing, we request June 30, 2022 if it is available, with a due date of a response to the motion by June 27, 2022.

In addition, Plaintiff's counsel apologizes but I will be on a plane at 8 a.m. tomorrow and unable to appear in person. The flight is more than six hours. I should have notified the Court sooner but I had hoped the hearing would not be necessary. My mistake.

Thank you for your consideration.

Very truly yours,



Arthur D. Goldman

Cc: Anthony Paronich, Esquire